

EXHIBIT A

From: Helen Chaitman

Sent: Thursday, October 06, 2016 4:45 PM

To: Hunt, Dean D. <dhunt@bakerlaw.com>

Cc: Carlisle, Marie L. <mcarlisle@bakerlaw.com>; Murphy, Keith R. <kmurphy@bakerlaw.com>; Jacobs, Edward J. <ejacobs@bakerlaw.com>

Subject: RE: Discovery Arbitrator

Dean: Subject to our working out an orderly procedure, I am prepared to present **all** of the outstanding discovery issues on both sides to the arbitrator. But let's organize this in a way that makes sense so that the arbitrator understands the issues, etc. This is not like presenting the issues to Judge Bernstein who has been living with these cases for six years. Let's start with a list of the issues and then jointly figure out the most coherent way to present them. I think it makes sense to do these one at a time so the arbitrator is dealing with only one issue at a time.

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From: Hunt, Dean D. [<mailto:dhunt@bakerlaw.com>]

Sent: Thursday, October 06, 2016 11:12 AM

To: Helen Chaitman <hchaitman@chaitmanllp.com>

Cc: Carlisle, Marie L. <mcarlisle@bakerlaw.com>; Murphy, Keith R. <kmurphy@bakerlaw.com>; Jacobs, Edward J. <ejacobs@bakerlaw.com>

Subject: Re: Discovery Arbitrator

Yes. Wilenitz too. Under the order, the Trustee is required to pay the first \$50,000 per adversary proceeding, so referring to the arbitrator should not cost your clients anything additional.

I'm traveling today for my son's wedding. Let me know by email if this works for you and we can work on a stipulation that needs to be filed with the court referring the disputes to the arbitrator.

Thanks,
Dean

Sent from my iPhone

On Oct 5, 2016, at 3:29 PM, Helen Chaitman <hchaitman@chaitmanllp.com> wrote:

Would this include all pending issues? There is a motion to compel in Wilenitz. Are you including that?

Helen Davis Chaitman
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From: Hunt, Dean D. [<mailto:dhunt@bakerlaw.com>]
Sent: Wednesday, October 05, 2016 4:26 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Carlisle, Marie L. <mcarlisle@bakerlaw.com>
Subject: Discovery Arbitrator

Helen –

Are you interested in submitting the ongoing discovery disputes in the cases Marie and I are handling to the Discovery Arbitrator under the Order issued by Judge Bernstein on October 4? If so, we can set up a call to discuss the protocol for doing so.

Thanks,

Dean Hunt
Partner

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<image004.jpg>

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